

EXHIBIT B

Honorable Eric N. Vitaliano
November __, 2021

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VIA PACER

Honorable Eric N. Vitaliano
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Jennifer Hough v. Onika Tanya Maraj AKA ("Nicki Minaj") and Kenneth Petty AKA ("Zoo"); Case No. 1:21-cv-04568-ENV-JRC

Dear Judge Vitaliano:

Tyrone Blackburn, Esq., McGivney, Kluger, Clark & Intoccia, P.C., and this firm represent the Plaintiff Jennifer Hough ("Plaintiff") in the above referenced action. This letter is written jointly with Defendant Onika Tanya Maraj's ("Defendant") counsel.

We write pursuant Rule III(A)(B) of the Court's Individual Motion Practice and Rules concerning briefing schedules. Upon approval by the Court, we write to provide a briefing schedule for Defendant's motion pursuant to FRCP 55(c) for leave to file a late answer to the Amended Complaint. In addition to filing an opposition, Plaintiff intends to cross-move for entry of default judgment against Defendant. Plaintiff's motion to enter default judgment against Defendant.¹ The parties have agreed to the below briefing schedule for these motions:

- Opposition to Defendant's motion for leave to file a late answer and Plaintiff's cross-motion for entry of default judgment are to be served and filed on **December 10, 2021**; and
- Reply in further support of Defendant's motion for leave to file a late answer and opposition to Plaintiff's cross-motion are to be served and filed on **December 17, 2021**.

Thank you for your attention to this matter.

Respectfully submitted,

Steven N. Gordon, Esq.

¹ We note that, on October 26, 2021, Your Honor Ordered that Plaintiff's motion pending for an Order to set aside the Clerk's denial to issue a Certificate of Default against Defendant [Dkt. Nos. 20-22] will be ruled on prior to a decision on the instant motions for which this briefing schedule is sought.

Honorable Eric N. Vitaliano
November __, 2021

cc:

Judd Burstein, Esq. (Via Pacer)
Emily Finestone, Esq. (Via Pacer)
Steven D. Isser, Esq. (Via Pacer)